

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

---

IN RE ROYAL BANK OF SCOTLAND  
GROUP PLC SECURITIES LITIGATION

---

09 Civ. 300 (DAB)

LIGHTHOUSE FINANCIAL GROUP,  
Individually and On Behalf of All Others  
Similarly Situated,

11 Civ. 398 (GBD)

Plaintiff,

v.

THE ROYAL BANK OF SCOTLAND  
GROUP PLC, *et al.*,

Defendants.

---

ETHAN GOLD, Individually and On Behalf of  
All Others Similarly Situated,

11 Civ. 1162 (NRB)

Plaintiff,

v.

THE ROYAL BANK OF SCOTLAND  
GROUP PLC, *et al.*,

Defendants.

---

**IRVING FIREMEN'S RELIEF AND RETIREMENT FUND'S JOINDER IN PLAINTIFF  
ETHAN GOLD'S RESPONSE TO LIGHTHOUSE FINANCIAL GROUP LLC'S  
MOTION TO CONSOLIDATE PURSUANT TO FED. R. CIV. P. 42(a)**

Proposed Lead Plaintiff movant Irving Firemen's Relief and Retirement Fund ("Irving Fire") respectfully joins Plaintiff Ethan Gold's response to Lighthouse Financial Group LLC's ("Lighthouse") motion to consolidate the above-captioned matters pursuant to Fed. R. Civ. P. 42(a).<sup>1</sup> Like Mr. Gold, Irving Fire does not object to consolidation of *Lighthouse Financial Group LLC v. The Royal Bank of Scotland Group PLC, et al.*, No. 11 Civ. 398 (GBD) (the "Lighthouse Action") and *Gold v. The Royal Bank of Scotland Group PLC, et al.*, No. 11 Civ. 1162 (NRB) (the "Gold Action") once the actions are transferred to one judge. However, for the reasons stated by Mr. Gold, Irving Fire, too, vigorously objects to Lighthouse's effort to violate the lead plaintiff provisions under the Private Securities Litigation Reform Act of 1995 ("PSLRA"), 15 U.S.C. § 78u-4(a)(3), attempting to usurp for itself a leadership position in this case before the PSLRA's 60-day deadline passes. *See* 15 U.S.C. § 78u-4(a)(3)(A)(i)(II) ("not later than 60 days after the date on which the notice is published, any member of the purported class may move the court to serve as lead plaintiff of the purported class"). *See* Gold Response at 4-6.

Moreover, the PSLRA notice Ethan Gold published alerting investors to the filing of his action stated putative class members have until April 19, 2011 to move for appointment as lead plaintiff. *See* Gold Response at 1, 3. Irving Fire intends to move for appointment as Lead Plaintiff. In order to ameliorate any deadline confusion caused by Lighthouse's defective filing and failure to provide PSLRA notice, Irving Fire respectfully requests that this Court confirm that pursuant to

---

<sup>1</sup> As Ethan Gold's response to Lighthouse's motion to consolidate explains at page 2: "Irving Firemen ... moved to intervene in *In re RBS* and requested that the court substitute it as the lead plaintiff for ADR investors ... Judge Batts issued ... the Feb. 16 Order den[ying] Irving Firemen's motion and noted the court's reluctance to delay *In re RBS* by including ADR claims in that action." (ECF No. 179, "Gold Response").

the provisions of the PSLRA, putative class members have until April 19, 2011 to file a motion with the Court for appointment as lead plaintiff. *Id.*

DATED: March 22, 2011

Respectfully submitted,

SCOTT+SCOTT LLP

/s/ David R. Scott

DAVID R. SCOTT (DS 8053)  
BETH A. KASWAN (BK 0264)  
JOSEPH P. GUGLIELMO (JG 2447)  
DONALD A. BROGGI  
500 Fifth Avenue, 40th Floor  
New York, NY 10110  
Tel: 212/223-6444  
Fax: 212/223-6334  
Email: drscott@scott-scott.com  
bkaswan@scott-scott.com  
jguglielmo@scott-scott.com  
dbroggi@scott-scott.com

and

SCOTT+SCOTT LLP  
MARY K. BLASY  
707 Broadway, Suite 1000  
San Diego, CA 92101  
Tel: 619/233-4565  
Fax: 619/233-0508  
Email: mblasy@scott-scott.com

*Counsel for Irving Firemen's Relief and Retirement  
Fund*

**CERTIFICATE OF SERVICE**

I hereby certify that on March 22, 2011, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List, and I hereby certify that I caused the foregoing document or paper to be mailed via the United States Postal Service to the non-CM/ECF participants indicated on the Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on March 22, 2011.

/s/ David R. Scott

---

DAVID R. SCOTT (DS 8053)  
SCOTT+SCOTT LLP  
500 Fifth Avenue, 40th Floor  
New York, NY 10110  
Tel: 212/223-6444  
Fax: 212/223-6334  
Email: drscott@scott-scott.com

*Counsel for Irving Firemen's Relief and Retirement  
Fund*